

## Appendix L (Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

County	Class	Band Width	FCC Channel Number	Base Frequency	Mobile Frequency
Morgan	General Use	Voice 25KHz	13-16	764.0875	794.0875
Morgan	General Use	Voice 25KHz	85-88	764.5375	794.5375
Morgan	General Use	Voice 25KHz	125-128	764.7875	794.7875
Morgan	General Use	Voice 25KHz	173-176	765.0875	795.0875
Morgan	General Use	Voice 25KHz	329-332	766.0625	796.0625
Morgan	General Use	Voice 25KHz	385-388	766.4125	796.4125
Morgan	General Use	Voice 25KHz	429-432	766.6875	796.6875
Morgan	General Use	Voice 25KHz	477-480	766.9875	796.9875
Morgan	General Use	Voice 25KHz	525-528	773.2875	803.2875
Morgan	General Use	Voice 25KHz	577-580	773.6125	803.6125
Morgan	General Use	Voice 25KHz	617-620	773.8625	803.8625
Morgan	General Use	Voice 25KHz	673-676	774.2125	804.2125
Morgan	General Use	Voice 25KHz	713-716	774.4625	804.4625
Morgan	General Use	Voice 25KHz	753-756	774.7125	804.7125
Morgan	General Use	Voice 25KHz	793-796	774.9625	804.9625
Morgan	General Use	Voice 25KHz	873-876	775.4625	805.4625
Morgan	General Use	Voice 25KHz	917-920	775.7375	805.7375
Otero	General Use	Voice 25KHz	13-16	764.0875	794.0875
Otero	General Use	Voice 25KHz	97-100	764.6125	794.6125
Otero	General Use	Voice 25KHz	137-140	764.8625	794.8625
Otero	General Use	Voice 25KHz	241-244	765.5125	795.5125
Otero	General Use	Voice 25KHz	341-344	766.1375	796.1375
Otero	General Use	Voice 25KHz	381-384	766.3875	796.3875
Otero	General Use	Voice 25KHz	425-428	766.6625	796.6625
Otero	General Use	Voice 25KHz	469-472	766.9375	796.9375
Otero	General Use	Voice 25KHz	509-512	773.1875	803.1875
Otero	General Use	Voice 25KHz	553-556	773.4625	803.4625
Otero	General Use	Voice 25KHz	597-600	773.7375	803.7375
Otero	General Use	Voice 25KHz	637-640	773.9875	803.9875
Otero	General Use	Voice 25KHz	717-720	774.4875	804.4875
Otero	General Use	Voice 25KHz	757-760	774.7375	804.7375
Otero	General Use	Voice 25KHz	913-916	775.7125	805.7125
Ouray	General Use	Voice 25KHz	173-176	765.0875	795.0875
Ouray	General Use	Voice 25KHz	213-216	765.3375	795.3375
Ouray	General Use	Voice 25KHz	349-352	766.1875	796.1875
Ouray	General Use	Voice 25KHz	397-400	766.4875	796.4875

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Ouray	General Use	Voice 25KHz	525-528	773.2875	803.2875
Ouray	General Use	Voice 25KHz	797-800	774.9875	804.9875
Ouray	General Use	Voice 25KHz	941-944	775.8875	805.8875
Park	General Use	Voice 25KHz	53-56	764.3375	794.3375
Park	General Use	Voice 25KHz	321-324	766.0125	796.0125
Park	General Use	Voice 25KHz	361-364	766.2625	796.2625
Park	General Use	Voice 25KHz	453-456	766.8375	796.8375
Park	General Use	Voice 25KHz	537-540	773.3625	803.3625
Park	General Use	Voice 25KHz	745-748	774.6625	804.6625
Phillips	General Use	Voice 25KHz	81-84	764.5125	794.5125
Phillips	General Use	Voice 25KHz	177-180	765.1125	795.1125
Phillips	General Use	Voice 25KHz	321-324	766.0125	796.0125
Phillips	General Use	Voice 25KHz	393-396	766.4625	796.4625
Phillips	General Use	Voice 25KHz	469-472	766.9375	796.9375
Phillips	General Use	Voice 25KHz	481-484	773.0125	803.0125
Phillips	General Use	Voice 25KHz	529-532	773.3125	803.3125
Phillips	General Use	Voice 25KHz	581-584	773.6375	803.6375
Phillips	General Use	Voice 25KHz	637-640	773.9875	803.9875
Phillips	General Use	Voice 25KHz	789-792	774.9375	804.9375
Phillips	General Use	Voice 25KHz	861-864	775.3875	805.3875
Pitkin	General Use	Voice 25KHz	249-252	765.5625	795.5625
Pitkin	General Use	Voice 25KHz	325-328	766.0375	796.0375
Pitkin	General Use	Voice 25KHz	365-368	766.2875	796.2875
Pitkin	General Use	Voice 25KHz	429-432	766.6875	796.6875
Pitkin	General Use	Voice 25KHz	497-500	773.1125	803.1125
Pitkin	General Use	Voice 25KHz	573-576	773.5875	803.5875
Pitkin	General Use	Voice 25KHz	793-796	774.9625	804.9625
Prowers	General Use	Voice 25KHz	17-20	764.1125	794.1125
Prowers	General Use	Voice 25KHz	93-96	764.5875	794.5875
Prowers	General Use	Voice 25KHz	165-168	765.0375	795.0375
Prowers	General Use	Voice 25KHz	205-208	765.2875	795.2875
Prowers	General Use	Voice 25KHz	253-256	765.5875	795.5875
Prowers	General Use	Voice 25KHz	297-300	765.8625	795.8625
Prowers	General Use	Voice 25KHz	369-372	766.3125	796.3125
Prowers	General Use	Voice 25KHz	413-416	766.5875	796.5875
Prowers	General Use	Voice 25KHz	453-456	766.8375	796.8375



# **Appendix L (Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Class	Band Width	FCC Channel Number	Base Frequency	Mobile Frequency
Prowers	General Use	Voice 25KHz	485-488	773.0375	803.0375
Prowers	General Use	Voice 25KHz	537-540	773.3625	803.3625
Prowers	General Use	Voice 25KHz	589-592	773.6875	803.6875
Prowers	General Use	Voice 25KHz	629-632	773.9375	803.9375
Prowers	General Use	Voice 25KHz	669-672	774.1875	804.1875
Prowers	General Use	Voice 25KHz	709-712	774.4375	804.4375
Prowers	General Use	Voice 25KHz	753-756	774.7125	804.7125
Prowers	General Use	Voice 25KHz	821-824	775.1375	805.1375
Prowers	General Use	Voice 25KHz	861-864	775.3875	805.3875
Prowers	General Use	Voice 25KHz	905-908	775.6625	805.6625
Prowers	General Use	Voice 25KHz	945-948	775.9125	805.9125
Pueblo	General Use	Voice 25KHz	49-52	764.3125	794.3125
Pueblo	General Use	Voice 25KHz	89-92	764.5625	794.5625
Pueblo	General Use	Voice 25KHz	129-132	764.8125	794.8125
Pueblo	General Use	Voice 25KHz	173-176	765.0875	795.0875
Pueblo	General Use	Voice 25KHz	213-216	765.3375	795.3375
Pueblo	General Use	Voice 25KHz	253-256	765.5875	795.5875
Pueblo	General Use	Voice 25KHz	293-296	765.8375	795.8375
Pueblo	General Use	Voice 25KHz	333-336	766.0875	796.0875
Pueblo	General Use	Voice 25KHz	373-376	766.3375	796.3375
Pueblo	General Use	Voice 25KHz	417-420	766.6125	796.6125
Pueblo	General Use	Voice 25KHz	477-480	766.9875	796.9875
Pueblo	General Use	Voice 25KHz	521-524	773.2625	803.2625
Pueblo	General Use	Voice 25KHz	565-568	773.5375	803.5375
Pueblo	General Use	Voice 25KHz	617-620	773.8625	803.8625
Pueblo	General Use	Voice 25KHz	661-664	774.1375	804.1375
Pueblo	General Use	Voice 25KHz	701-704	774.3875	804.3875
Pueblo	General Use	Voice 25KHz	741-744	774.6375	804.6375
Pueblo	General Use	Voice 25KHz	781-784	774.8875	804.8875
Pueblo	General Use	Voice 25KHz	821-824	775.1375	805.1375
Pueblo	General Use	Voice 25KHz	865-868	775.4125	805.4125
Pueblo	General Use	Voice 25KHz	905-908	775.6625	805.6625
Pueblo	General Use	Voice 25KHz	945-948	775.9125	805.9125
Rio Blanco	General Use	Voice 25KHz	49-52	764.3125	794.3125
Rio Blanco	General Use	Voice 25KHz	433-436	766.7125	796.7125

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County	Class	Band Width	FCC Channel Number	Base Frequency	Mobile Frequency
Rio Blanco	General Use	Voice 25KHz	501-504	773.1375	803.1375
Rio Blanco	General Use	Voice 25KHz	577-580	773.6125	803.6125
Rio Blanco	General Use	Voice 25KHz	629-632	773.9375	803.9375
Rio Blanco	General Use	Voice 25KHz	789-792	774.9375	804.9375
Rio Grande	General Use	Voice 25KHz	125-128	764.7875	794.7875
Rio Grande	General Use	Voice 25KHz	177-180	765.1125	795.1125
Rio Grande	General Use	Voice 25KHz	285-288	765.7875	795.7875
Rio Grande	General Use	Voice 25KHz	381-384	766.3875	796.3875
Rio Grande	General Use	Voice 25KHz	429-432	766.6875	796.6875
Rio Grande	General Use	Voice 25KHz	469-472	766.9375	796.9375
Rio Grande	General Use	Voice 25KHz	509-512	773.1875	803.1875
Rio Grande	General Use	Voice 25KHz	589-592	773.6875	803.6875
Rio Grande	General Use	Voice 25KHz	633-636	773.9625	803.9625
Rio Grande	General Use	Voice 25KHz	709-712	774.4375	804.4375
Rio Grande	General Use	Voice 25KHz	861-864	775.3875	805.3875
Routt	General Use	Voice 25KHz	13-16	764.0875	794.0875
Routt	General Use	Voice 25KHz	81-84	764.5125	794.5125
Routt	General Use	Voice 25KHz	129-132	764.8125	794.8125
Routt	General Use	Voice 25KHz	177-180	765.1125	795.1125
Routt	General Use	Voice 25KHz	257-260	765.6125	795.6125
Routt	General Use	Voice 25KHz	329-332	766.0625	796.0625
Routt	General Use	Voice 25KHz	377-380	766.3625	796.3625
Routt	General Use	Voice 25KHz	417-420	766.6125	796.6125
Routt	General Use	Voice 25KHz	457-460	766.8625	796.8625
Routt	General Use	Voice 25KHz	837-840	775.2375	805.2375
Routt	General Use	Voice 25KHz	905-908	775.6625	805.6625
Routt	General Use	Voice 25KHz	945-948	775.9125	805.9125
Saguache	General Use	Voice 25KHz	85-88	764.5375	794.5375
Saguache	General Use	Voice 25KHz	217-220	765.3625	795.3625
Saguache	General Use	Voice 25KHz	257-260	765.6125	795.6125
Saguache	General Use	Voice 25KHz	369-372	766.3125	796.3125
Saguache	General Use	Voice 25KHz	421-424	766.6375	796.6375
Saguache	General Use	Voice 25KHz	541-544	773.3875	803.3875
Saguache	General Use	Voice 25KHz	609-612	773.8125	803.8125
Saguache	General Use	Voice 25KHz	785-788	774.9125	804.9125



# **Appendix L (Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Class	Band Width	FCC Channel Number	Base Frequency	Mobile Frequency
San Juan	General Use	Voice 25KHz	341-344	766.1375	796.1375
San Juan	General Use	Voice 25KHz	405-408	766.5375	796.5375
San Juan	General Use	Voice 25KHz	453-456	766.8375	796.8375
San Juan	General Use	Voice 25KHz	493-496	773.0875	803.0875
San Juan	General Use	Voice 25KHz	533-536	773.3375	803.3375
San Juan	General Use	Voice 25KHz	605-608	773.7875	803.7875
San Juan	General Use	Voice 25KHz	833-836	775.2125	805.2125
San Miguel	General Use	Voice 25KHz	13-16	764.0875	794.0875
San Miguel	General Use	Voice 25KHz	121-124	764.7625	794.7625
San Miguel	General Use	Voice 25KHz	253-256	765.5875	795.5875
San Miguel	General Use	Voice 25KHz	293-296	765.8375	795.8375
San Miguel	General Use	Voice 25KHz	333-336	766.0875	796.0875
San Miguel	General Use	Voice 25KHz	425-428	766.6625	796.6625
San Miguel	General Use	Voice 25KHz	465-468	766.9125	796.9125
San Miguel	General Use	Voice 25KHz	485-488	773.0375	803.0375
San Miguel	General Use	Voice 25KHz	545-548	773.4125	803.4125
San Miguel	General Use	Voice 25KHz	597-600	773.7375	803.7375
San Miguel	General Use	Voice 25KHz	709-712	774.4375	804.4375
San Miguel	General Use	Voice 25KHz	825-828	775.1625	805.1625
Sedgwick	General Use	Voice 25KHz	165-168	765.0375	795.0375
Sedgwick	General Use	Voice 25KHz	333-336	766.0875	796.0875
Sedgwick	General Use	Voice 25KHz	377-380	766.3625	796.3625
Sedgwick	General Use	Voice 25KHz	441-444	766.7625	796.7625
Sedgwick	General Use	Voice 25KHz	537-540	773.3625	803.3625
Sedgwick	General Use	Voice 25KHz	593-596	773.7125	803.7125
Sedgwick	General Use	Voice 25KHz	669-672	774.1875	804.1875
Summit	General Use	Voice 25KHz	85-88	764.5375	794.5375
Summit	General Use	Voice 25KHz	125-128	764.7875	794.7875
Summit	General Use	Voice 25KHz	253-256	765.5875	795.5875
Summit	General Use	Voice 25KHz	385-388	766.4125	796.4125
Summit	General Use	Voice 25KHz	669-672	774.1875	804.1875
Summit	General Use	Voice 25KHz	717-720	774.4875	804.4875
Teller	General Use	Voice 25KHz	353-356	766.2125	796.2125
Teller	General Use	Voice 25KHz	393-396	766.4625	796.4625
Teller	General Use	Voice 25KHz	441-444	766.7625	796.7625
Teller	General Use	Voice 25KHz	545-548	773.4125	803.4125
Teller	General Use	Voice 25KHz	593-596	773.7125	803.7125
Teller	General Use	Voice 25KHz	665-668	774.1625	804.1625

## Appendix L (Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

County	Class	Band Width	FCC Channel Number	Base Frequency	Mobile Frequency
Washington	General Use	Voice 25KHz	53-56	764.3375	794.3375
Washington	General Use	Voice 25KHz	241-244	765.5125	795.5125
Washington	General Use	Voice 25KHz	281-284	765.7625	795.7625
Washington	General Use	Voice 25KHz	369-372	766.3125	796.3125
Washington	General Use	Voice 25KHz	445-448	766.7875	796.7875
Washington	General Use	Voice 25KHz	517-520	773.2375	803.2375
Washington	General Use	Voice 25KHz	589-592	773.6875	803.6875
Washington	General Use	Voice 25KHz	629-632	773.9375	803.9375
Weld	General Use	Voice 25KHz	57-60	764.3625	794.3625
Weld	General Use	Voice 25KHz	97-100	764.6125	794.6125
Weld	General Use	Voice 25KHz	161-164	765.0125	795.0125
Weld	General Use	Voice 25KHz	201-204	765.2625	795.2625
Weld	General Use	Voice 25KHz	321-324	766.0125	796.0125
Weld	General Use	Voice 25KHz	361-364	766.2625	796.2625
Weld	General Use	Voice 25KHz	405-408	766.5375	796.5375
Weld	General Use	Voice 25KHz	453-456	766.8375	796.8375
Weld	General Use	Voice 25KHz	481-484	773.0125	803.0125
Weld	General Use	Voice 25KHz	541-544	773.3875	803.3875
Weld	General Use	Voice 25KHz	665-668	774.1625	804.1625
Weld	General Use	Voice 25KHz	781-784	774.8875	804.8875
Yuma	General Use	Voice 25KHz	17-20	764.1125	794.1125
Yuma	General Use	Voice 25KHz	97-100	764.6125	794.6125
Yuma	General Use	Voice 25KHz	161-164	765.0125	795.0125
Yuma	General Use	Voice 25KHz	201-204	765.2625	795.2625
Yuma	General Use	Voice 25KHz	257-260	765.6125	795.6125
Yuma	General Use	Voice 25KHz	353-356	766.2125	796.2125
Yuma	General Use	Voice 25KHz	409-412	766.5625	796.5625
Yuma	General Use	Voice 25KHz	477-480	766.9875	796.9875
Yuma	General Use	Voice 25KHz	505-508	773.1625	803.1625
Yuma	General Use	Voice 25KHz	553-556	773.4625	803.4625
Yuma	General Use	Voice 25KHz	621-624	773.8875	803.8875
Yuma	General Use	Voice 25KHz	665-668	774.1625	804.1625
Yuma	General Use	Voice 25KHz	717-720	774.4875	804.4875
Yuma	General Use	Voice 25KHz	757-760	774.7375	804.7375
Yuma	General Use	Voice 25KHz	797-800	774.9875	804.9875
Yuma	General Use	Voice 25KHz	837-840	775.2375	805.2375
Yuma	General Use	Voice 25KHz	877-880	775.4875	805.4875
Yuma	General Use	Voice 25KHz	917-920	775.7375	805.7375

## **Appendix L (Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

### **Part B - Wideband (150 kHz) Data Channel Set**

From the meeting notes of October 13, 2005 we excerpt the following, relevant to the subject of Wideband Data channels:

- *Wide-band 700, Emery [Reynolds] has a letter that was electronically filed by the FCC concerning the ability of taking the wide band 700 band wider than the 150KHz. More information to be sent to the group. It was discussed that there is some off the shelf equipment today that could be used today for 700. It is more efficient (Dennis Kalvels) to use the wide-band channels as an aggregate, rather than using many narrow-band channels together.*
- *Currently there are 16, 150KHz channels available state-wide, there are no state "set-aside" for the state. The question is within the rules, what can we do. The group decided that we would file the plan and re-address the wide band data channels by 04/30/2006, motion made, second and no one was opposed. The wording will be changed in the current plan, that this will be addressed later. We need to remain consistent on the data channels for what was submitted to do the same with voice channels.*

The allotment of 150 kHz data channels will be determined at a later date as indicated in the paragraph above.

## **Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

Tab 1 – Minority Statement of the City and County of Denver, Colorado

Tab 2 - Fox Ridge Communications, Inc. Letter dtd February 22, 2005 provided by the City of Aurora

Tab 3 - Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, Breakdown between counties and cities, provided by the City of Aurora

Tab 4 - Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, Review of draft Region 7, 700 MHz Plan, provided by the City of Aurora

Tab 5 - Fox Ridge Communications, Inc. New Plan by County provided by the City of Aurora

Tab 6 - Fox Ridge Communications, Inc. New Plan by Channel provided by the City of Aurora

Tab 7 - KISSINGER & FELLMAN, P.C. Letter dtd July 12, 2005 RE: City of Aurora / Concerns With Draft of Region 7 Plan, provided by the City of Aurora



**Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 -  
700 MHz Regional Plan**

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**Tab 1** (Minority Statement of the City and County of Denver, Colorado) to **Appendix M**  
(Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan



JOHN W. HICKENLOOPER  
Mayor

## **CITY AND COUNTY OF DENVER**

DENVER POLICE DEPARTMENT  
ADMINISTRATION BUILDING  
1331 CHEROKEE STREET  
DENVER, COLORADO 80204-2787

PHONE: (720) 913-2000

### **Minority Statement of the City and County of Denver, Colorado**

The City and County of Denver, Colorado ("Denver") hereby submits its opposition to the Region 7 RPC Regional Plan for the allocation of 700 MHz Public Safety Spectrum throughout the State of Colorado.

It is Denver's position that the CAPRAD allocation model, and the alterations made by the Region 7 RPC, significantly under-allocates spectrum for Denver. Further, the proposal by the RPC to potentially make available additional spectrum at a later date is insufficient to address the disparities in the Plan, and significantly impairs Denver's ability to deploy a 700 MHz system.

The Candidate Pre-Allotment Statement dated April 1, 2005 notes a number of the problems with the CAPRAD model. For example, the Statement recognizes that the CAPRAD model does not correlate directly with population differences, and is too coarse in scope to use solely in making decisions among individual agencies in a county-like area.

However, despite the recognition of the problems with the CAPRAD model, the only solution offered by the Plan is to hold some channels in reserve, to then be used as needs dictate. It is Denver's position that this only creates a problem to be handled later, instead of addressing the problem now. A review of the Denver allotment ready shows why the "deal with it later" approach is inappropriate.

Denver's pre-allotment consists of thirteen (13) channel pairs, less than Adams (14), Arapahoe (16) and Jefferson (17) counties. Yet Denver's population of 550,000, which can swell by more than 200,000 with the influx of travelers and sports events and conventions, dwarfs the population of any of the other counties. In addition, it is difficult

**Tab 1** (Minority Statement of the City and County of Denver, Colorado) to **Appendix M**  
(Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

to justify the allocation of seven (7) channels for Elbert County for its annual emergency call volume of 4,000, when Denver's emergency call volume is more than one million calls per year, resulting in more than 500,000 actual dispatch calls per year. Further, on the basis of numbers of system users, the more than 4500 Denver Police/Fire/EMS (not including Federal authorities that utilize the current Denver radio system) is significantly greater than any other county.

The Plan makes no attempt to reconcile these differences between the CAPRAD model, which does not consider any qualitative issues, and the reality of the communications needs in the area. Instead, the Plan merely "passes the buck" by putting off decisions for another day. This decision does not reflect the purpose of the RPC. Rather, it is the purpose of the RPC to create a plan for 700 MHz allocations which are fair and equitable, which must not solely be based upon computer projections. The identification of Denver as a core city by the Urban Area Security Initiative Grant Funding Project recognizes the importance and needs of first responder communication in Denver. The Regional Plan for 700 MHz should also recognize these needs.



**Fox Ridge Communications, Inc.**  
*Telecommunications Consultants*

February 22, 2005

Mr. Michael Bedwell  
15151 E Alameda Parkway - 4<sup>th</sup> Floor  
Aurora, CO 80012

Dear Mr. Bedwell:

At your request, we have reviewed the "Candidate Pre-Allotment Statement 02/10/2005" that was prepared by the Region 7 Regional Planning Committee. We offer the following comments.

As a first reaction to the document, the approach taken amounts to no planning at all. The concept of a regional pool means that jurisdictions will receive channels on a first-come, first-served basis. Those who document their needs early will have the best chance of obtaining channels. This is contrary to the Committee's stated belief in the document that, "channel quantity re-assignment relative to population ... has a certain intuitive appeal." We believe that such a concept should be a central goal of the Region 7 plan and propose the following.

First, our previous work showed that the CAPRAD plan did not allocate the 700 MHz channels based on population. There may be several reasons for the CAPRAD allocation, but if the outcome of the CAPRAD proposal is contrary to Region 7 desires, then it should be modified. Second, our previous work was a "proof-of-concept" paper that proposed realignment based on population. We acknowledge that the specific channel plan was based primarily on realignment of the number of channels, although a cursory attempt was made to reassign channels in a manner that could be made to work as specific site locations were proposed.

Our original channel plan was reviewed and challenged on the basis of some short co-channel and adjacent channel assignments. The analysis was done based on distanced between geographic centers of the various jurisdictions. Such an analysis does not, and cannot, taken into account actual transmitter placement, but it does provide a guide on how channels can be allotted.

**Tab 2 (Fox Ridge Communications, Inc. Letter dtd February 22, 2005 provided by the City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

Fox Ridge has reviewed the proposed channel plan using the centroid concept. In developing the revised plan, there were three basic conditions that had to be met for a channel to be assigned. First, the closest co-channel assignment had to be at least 105 km away. This is consistent with the FCC's 800 and 900 MHz channel use rules that allow spacing as close as 88 km if power and antenna height conditions are met and at 113 km with no restrictions. In other words, most assignments at 105 km should be workable, especially with careful transmitter placement and taking advantage of natural terrain shielding. Second, no adjacent channel assignment would be made at less than 25 km. The FCC has no adjacent channel requirements and they are generally not taken into account at 800 and 900 MHz.<sup>1</sup> Third, adjacent channels would not be assigned within a jurisdiction.

The previous work by Fox Ridge formed the basis of the revised channel plan. As before, no channels were moved to border areas so that adjacent regions could rely on the CAPRAD allocations. The quantity of channels for each jurisdiction remains the same as the previous plan. Specific channel assignments, however, have been modified to meet the above three conditions. The attached spreadsheets show the results of the revision. The spreadsheets are sorted by jurisdiction and then by channel numbers. The spreadsheets show the distances to the nearest co-channel and adjacent channel assignments and the names of the jurisdictions. In all cases, the above three conditions have been met.

Fox Ridge agrees with the Region 7 RPC that the eventual roll-out of channels may need to be modified based on the identified needs of each jurisdiction. But, the planning process should have an initial basis upon which such modifications can be made. We believe that the revised plan can easily form that basis. Failure to adopt a starting point can easily lead to case-by-case channel decisions that do not result in the best spectrum utilization. Having a starting point is in no way intended to limit the region's Frequency Advisory Committee authority, but rather, to make the FAC's job somewhat easier.

No region can say with certainty that the plans that they adopt today will be perfect from the beginning, but the entire concept of regional planning is to create and adopt a plan. An amorphous channel pool can hardly be considered a plan. A plan based on population assures that those areas with the greatest needs will have the most channels. It also helps assure that jurisdictions that are later in building systems will still have channel capacity available. Adopting a channel plan does not eliminate the need for site-by-site frequency coordination, but it certainly helps simplify that process.

In my view, speaking as the former Chief of the FCC's Private Radio Bureau and the approving official on all of the original 55 NPSPAC plans, I am confident that the FCC would rather see a well thought out plan showing channel assignments to jurisdictions rather than a plan

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<sup>1</sup> We recognize that adjacent channel considerations are made for the NPSPAC channels. But, this is because these channels are 25.0 kHz channels on 12.5 kHz centers. Thus, adjacent 12.5 kHz spaced channels have overlapping spectrum that must be dealt with through geographic separation. Such is not the case at 700 MHz.

**Tab 2** (Fox Ridge Communications, Inc. Letter dtd February 22, 2005 provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments)  
Region 7 - 700 MHz Regional Plan

that presents no more than a regional pool concept. If channels are simply pooled and assigned as requested, there is really no need for regional planning committees.

I urge the Region 7 RPC to consider the revised plan as a starting point.

Sincerely,

Ralph A. Haller



**Tab 2** (Fox Ridge Communications, Inc. Letter dtd February 22, 2005 provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments)  
Region 7 - 700 MHz Regional Plan

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**Tab 3** (Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, Breakdown between counties and cites, provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

**Fox Ridge Communications, Inc.**  
*Telecommunications Consultants*

July 11, 2005

Mr. Michael Bedwell  
City of Aurora  
15151 E. Alameda Parkway - 4<sup>th</sup> Floor  
Aurora, CO 80012

Dear Mr. Bedwell:

This is a quick response to your request for a breakdown between counties and cities for 700 MHz channels. Specific channels have not been identified, only number of channels. This study relies on our previous work that identified numbers of channels that should be allocated to each county based on population.

This study is limited to the cities of Aurora, Arvada, Lakewood, Westminster, and the West Metro Fire District. Except for Lakewood, all of these entities operate in more than one county. To conduct the study, the number of channels that we originally allocated to each county, in our original study of March 2004, was further divided between counties and entities listed above. This process involved the counties of Adams, Arapahoe, Douglas, and Jefferson. In the cases of the cities, four channel groups were removed from the county allocation based on the percentage of population of the particular city in a county. In the case of the West Metro Fire District, two two-channel blocks were allocated for its use in Douglas and Jefferson counties, not on the basis of population but to provide a minimal operational capacity. We relied on the 2004 population data that you supplied.

The attached chart shows the results of the work. By way of explanation of the chart, consider Arapahoe County. Our previous projection gave the county 22 channels. However, Aurora has nearly half of the total population of the county, so the original 22 channels have been divided equally between Arapahoe County and the City of Aurora. The next step would obviously be to determine which specific channels should be allocated to each entity.

I hope this is helpful. If you have additional questions, please let me know.

Sincerely,



Ralph A. Haller  
President

122 Baltimore St. - Suite 200 • Gettysburg, PA 17325 • Phone (717) 334-7991 • FAX (717) 334-6656

**Tab 3** (Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, Breakdown between counties and cites, provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

County	City	Population	% of County	4 ch groups	Prop groups
<b>Adams County</b>		398165	100.00	16	10
	Aurora	43204	10.85		2
	Arvada	4000	1.00		1
	Westminster	63856	16.04		3
<b>Arapahoe County</b>		524414	100.00	22	11
	Aurora	252655	48.18		11
<b>Douglas County</b>		234193	100.00	8	6
	Aurora	169	0.07		0
	West Metro Fire Dist	105000	44.83		2
<b>Jefferson County</b>		531654	100.00	24	10
	Arvada	98655	18.56		4
	Westminster	43507	8.18		2
	Lakewood	145532	27.37		6
	West Metro Fire Dist	195000	36.68		2



**Tab 4** (Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, review of draft Region 7, 700 MHz plan, provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

**Fox Ridge Communications, Inc.**  
*Telecommunications Consultants*

July 11, 2005

Mr. Michael Bedwell  
City of Aurora  
15151 E. Alameda Parkway - 4<sup>th</sup> Floor  
Aurora, CO 80012

Dear Mr. Bedwell:

At your request, Fox Ridge Communications, Inc. ("FRCI") has reviewed the draft Region 7, 700 MHz plan. Although clearly considerable work effort has been expended to produce the document, the plan fails to address the concerns of the City of Aurora. Specifically, Aurora and other such cities have no assurances that they will receive a fair number of 700 MHz channels through the procedures described in the plan.

Early in the process, we identified major discrepancies between population density and number of allotted channels that were assigned by the CAPRAD program. One of the most vivid anomalies occurs with Morgan County. Morgan County has a population of only 27,171 persons, yet the CAPRAD program assigned 68, 6.25 kHz channels to the county. On the other hand, Denver has a population of 554,636 persons and received only 56 channels. Similarly, Arapahoe County has a population of 487,967 persons and received only 64 channels. It is our view that higher population density areas simply need more channel capacity to support necessary public safety activities.

FRCI prepared an alternate plan in March 2004, that reallocated the channels in Colorado based primarily on population density. That plan was later revised in February 2005, to change specific channel assignments, but not alter the number of channels being assigned for use within a particular county. The alternate plans prepared by FRCI attempted to move channels in from regional borders to the most populated areas of the state, in and around Denver. Because channels were not moved outward in to border regions, the original CAPRAD allocations at the border were maintained or reduced. This made coordination with adjacent regions easier, as adjacent regions could rely on the CAPRAD plan. At the same time, much needed channels became available in the Denver area, which has over 60 per cent of the population of the state.

The draft plan appears to ignore or reject the idea that channels should be allotted on the basis of population. The discrepancy between the CAPRAD allocation and population density was a legitimate concern, properly raised by Aurora in the Region 7 meetings, that was not resolved. It remains a mystery why Morgan County should have 68 channels.

**Tab 4** (Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, review of draft Region 7, 700 MHz plan, provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

Another issue with the plan is that it does not reflect the needs of all jurisdictions. Although the CAPRAD program was set up to assign channels on the basis of county boundaries, this did not mean that the channels belonged to the county governments. To the contrary, the FCC Rules and Regulations state that the requirements of all eligible entities within the region be considered and, to the degree possible, be met (Section 90.525(a)(3)). There is no indication that the needs of local jurisdictions, such as the City of Aurora, were either considered or met. The plan never suggests channel allocations below the county level, leading to the conclusion that the plan simply ignores such needs. Reliance on the CAPRAD "county-based" program alone, even if it were totally accurate, abandons the FCC's requirements that the needs of all eligible entities be considered and provided for in the plan.

The plan also fails to provide for the future needs of all eligible entities. The plan in Appendix L recognizes the challenges of planning in the 11-county Denver metropolitan area, but does little to provide a solution. The plan explains that the CAPRAD preallotment program allocated 114, 25.0 kHz channels to these counties out of a total of 154, 25.0 kHz channels, leaving a reserve pool of 40 channels. However, use of these 40 channels may be severely restricted because of use of the channels in counties outside the Denver area, potentially making these 40 channels nothing more than a false hope for future expansion. Without an initial reallocation that involves more than the 11 counties, there may be little opportunity for implementing anything other than the CAPRAD model, even in the Denver area. If the CAPRAD program could have packed these additional 40 channels into the Denver area, it would already have done so.

The plan further relies on TSB-88 studies to determine interference levels that may be caused by proposed stations. The plan does not state what interference level would be acceptable for a new station. For the 470-512 MHz band, the Land Mobile Communications Council has settled on a maximum of five per cent new interference from a proposed station on 12.5 kHz offset channels. That level would seem high for design of 700 MHz public safety systems, but some level should be adopted in the plan. The plan also proposes using 40 dBuV/m or higher signal levels for primary service areas, but fails to explain which propagation model should be used to determine such levels. In short, the plan talks about interference protection, but never defines it.

In order to be responsive to the FCC, and more importantly, responsive to the legitimate end users, the plan should be modified in several ways. First, the plan should rely less on the CAPRAD allocations and modify the allocations to maximize channel allotments in high population density areas, especially in and around Denver. Second, the plan should show specific allocations for entities other than counties, e.g. for cities. Third, the plan should immediately allocate channels to governmental units without use of a questionable reserve frequency pool. This will assure that channels are available for entities that do not decide to build immediately. Any other method does amount to a first-come, first-serve system, even if the plan denies that. Fourth, the allocation criteria should be defined in more detail, particularly with regard to interference predictions.

**Tab 4** (Fox Ridge Communications, Inc. Letter dtd July 11, 2005, No Subject line, review of draft Region 7, 700 MHz plan, provided by the City of Aurora) to **Appendix M** (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan

*The plan developed by the Region 7 planning committee represents a good start, but it fails to resolve several major issues. Primarily, the plan fails to allocate sufficient channels in the areas of the state where they are most needed. The opportunity to correct the allocation plan exists today, but will not be available once entities begin building new systems.*

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph A. Haller", with a long horizontal flourish extending to the right.

Ralph A. Haller  
President



**Tab 5 ( Fox Ridge Communications, Inc. New Plan by County provided by City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Lat	Lon	FCC Channel Number	Closest Co-Chan (km)	County Name	Closest Lower (km)	County Name	Closest Upper (km)	County Name
Adams County	39.8666667	-104.3833333	217-220	188	Jackson County	77	Douglas County		
Adams County	39.8666667	-104.3833333	257-260	167	Yuma County	115	El Paso County		
Adams County	39.8666667	-104.3833333	337-340	356	Mesa County	115	El Paso County	77	Douglas County
Adams County	39.8666667	-104.3833333	397-400	213	Custer County	115	El Paso County	97	Gilpin County
Adams County	39.8666667	-104.3833333	437-440	209	Kiowa County	115	El Paso County	97	Gilpin County
Adams County	39.8666667	-104.3833333	505-508	167	Yuma County	77	Douglas County	69	Elbert County
Adams County	39.8666667	-104.3833333	537-540	130	Teller County	53	Denver County	53	Denver County
Adams County	39.8666667	-104.3833333	557-560	280	Alamosa County	97	Gilpin County	77	Douglas County
Adams County	39.8666667	-104.3833333	597-600	226	Otero County	130	Teller County	77	Douglas County
Adams County	39.8666667	-104.3833333	637-640	188	Phillips County	115	El Paso County		
Adams County	39.8666667	-104.3833333	701-704	187	Pueblo County			80	Jefferson County
Adams County	39.8666667	-104.3833333	741-744	187	Pueblo County			80	Jefferson County
Adams County	39.8666667	-104.3833333	757-760	128	Larimer County	80	Jefferson County		
Adams County	39.8666667	-104.3833333	821-824	115	El Paso County			80	Jefferson County
Adams County	39.8666667	-104.3833333	829-832	115	El Paso County	80	Jefferson County	86	Boulder County
Adams County	39.8666667	-104.3833333	861-864	188	Phillips County			53	Denver County
Alamosa County	37.6000000	-105.8000000	045-048	158	Gunnison County	104	Fremont County	133	Pueblo County
Alamosa County	37.6000000	-105.8000000	093-096	185	Lake County	177	El Paso County	104	Fremont County
Alamosa County	37.6000000	-105.8000000	133-136	158	Gunnison County	133	Pueblo County	104	Fremont County
Alamosa County	37.6000000	-105.8000000	241-244	158	Gunnison County			133	Pueblo County
Alamosa County	37.6000000	-105.8000000	297-300	206	Douglas County	177	El Paso County		
Alamosa County	37.6000000	-105.8000000	341-344	166	San Juan County	279	Mesa County	104	Fremont County
Alamosa County	37.6000000	-105.8000000	405-408	133	Pueblo County	116	Archuleta County	239	Eagle County
Alamosa County	37.6000000	-105.8000000	501-504	206	Douglas County	160	Las Animas County	104	Fremont County
Alamosa County	37.6000000	-105.8000000	557-560	138	Hinsdale County	104	Fremont County	206	Douglas County
Alamosa County	37.6000000	-105.8000000	597-600	187	Otero County	151	Teller County	158	Gunnison County
Alamosa County	37.6000000	-105.8000000	833-836	166	San Juan County	177	El Paso County	104	Fremont County
Alamosa County	37.6000000	-105.8000000	873-876	235	Montrose County	230	Jefferson County	160	Las Animas County
Alamosa County	37.6000000	-105.8000000	913-916	187	Otero County	116	Archuleta County	177	El Paso County
Arapahoe County	39.6500000	-104.3833333	041-044	157	Fremont County			96	Boulder County
Arapahoe County	39.6500000	-104.3833333	093-096	175	Lake County	91	El Paso County	49	Denver County
Arapahoe County	39.6500000	-104.3833333	133-136	160	Logan County	76	Jefferson County	157	Fremont County
Arapahoe County	39.6500000	-104.3833333	165-168	163	Pueblo County	49	Denver County	65	Broomfield County
Arapahoe County	39.6500000	-104.3833333	205-208	163	Pueblo County	49	Denver County	96	Boulder County



**Tab 5 ( Fox Ridge Communications, Inc. New Plan by County provided by City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Lat	Lon	FCC Channel Number	Closest Co-Chan (km)	County Name	Closest Lower (km)	County Name	Closest Upper (km)	County Name
Arapahoe County	39.6500000	-104.3833333	241-244	203	Otero County			49	Denver County
Arapahoe County	39.6500000	-104.3833333	289-292	199	Eagle County	91	El Paso County	84	Morgan County
Arapahoe County	39.6500000	-104.3833333	357-360	153	Crowley County	110	Teller County	76	Jefferson County
Arapahoe County	39.6500000	-104.3833333	389-392	247	Gunnison County	84	Morgan County	91	El Paso County
Arapahoe County	39.6500000	-104.3833333	409-412	107	Washington County	49	Denver County	96	Boulder County
Arapahoe County	39.6500000	-104.3833333	457-460	153	Crowley County	131	Park County	49	Denver County
Arapahoe County	39.6500000	-104.3833333	485-488	191	Custer County	91	El Paso County	96	Boulder County
Arapahoe County	39.6500000	-104.3833333	517-520	146	Larimer County	76	Jefferson County	163	Pueblo County
Arapahoe County	39.6500000	-104.3833333	529-532	191	Custer County	65	Broomfield County	49	Denver County
Arapahoe County	39.6500000	-104.3833333	569-572	182	Cheyenne County	65	Broomfield County	91	El Paso County
Arapahoe County	39.6500000	-104.3833333	581-584	199	Eagle County	76	Jefferson County	96	Boulder County
Arapahoe County	39.6500000	-104.3833333	609-612	238	Saguache County	65	Broomfield County	140	Summit County
Arapahoe County	39.6500000	-104.3833333	661-664	163	Pueblo County			49	Denver County
Arapahoe County	39.6500000	-104.3833333	785-788	199	Eagle County	49	Denver County	91	El Paso County
Arapahoe County	39.6500000	-104.3833333	837-840	157	Fremont County	96	Boulder County		
Arapahoe County	39.6500000	-104.3833333	877-880	171	Yuma County	49	Denver County		
Arapahoe County	39.6500000	-104.3833333	909-912	146	Larimer County	49	Denver County	76	Jefferson County
Archuleta County	37.1937778	-107.0031944	041-044	201	Fremont County			116	Alamosa County
Archuleta County	37.1937778	-107.0031944	249-252	223	Pitkin County	148	Dolores County	152	San Miguel County
Archuleta County	37.1937778	-107.0031944	345-348	201	Fremont County	85	San Juan County	126	Ouray County
Archuleta County	37.1937778	-107.0031944	401-404	267	Las Animas County	126	Ouray County	85	San Juan County
Archuleta County	37.1937778	-107.0031944	449-452	271	Garfield County	198	Delta County	85	San Juan County
Archuleta County	37.1937778	-107.0031944	537-540	246	Teller County	85	San Juan County	119	Saguache County
Archuleta County	37.1937778	-107.0031944	581-584	272	Eagle County	193	Huerfano County	139	Costilla County
Archuleta County	37.1937778	-107.0031944	621-624	272	Eagle County	248	Pueblo County	143	Montezuma County
Archuleta County	37.1937778	-107.0031944	701-704	248	Pueblo County			166	Gunnison County
Archuleta County	37.1937778	-107.0031944	837-840	201	Fremont County	85	San Juan County		
Archuleta County	37.1937778	-107.0031944	909-912	232	Lake County	241	Mesa County	116	Alamosa County
Baca County	37.3055555	-102.5286110	121-124	243	El Paso County			343	Rio Grande County
Baca County	37.3055555	-102.5286110	245-248	198	Pueblo County	124	Otero County	221	Kit Carson County
Baca County	37.3055555	-102.5286110	289-292	306	Arapahoe County	243	El Paso County	243	El Paso County
Baca County	37.3055555	-102.5286110	329-332	347	Morgan County	198	Pueblo County	243	El Paso County
Baca County	37.3055555	-102.5286110	389-392	306	Arapahoe County	215	Huerfano County	243	El Paso County
Baca County	37.3055555	-102.5286110	433-436	221	Kit Carson County	343	Rio Grande County	128	Kiowa County
Baca County	37.3055555	-102.5286110	473-476	167	Cheyenne County	124	Otero County	198	Pueblo County



**Tab 5 ( Fox Ridge Communications, Inc. New Plan by County provided by City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Lat	Lon	FCC Channel Number	Closest Co-Chan (km)	County Name	Closest Lower (km)	County Name	Closest Upper (km)	County Name
Baca County	37.3055555	-102.5286110	513-518	167	Cheyenne County	124	Otero County	306	Arapahoe County
Baca County	37.3055555	-102.5286110	581-584	306	Arapahoe County	215	Huerfano County	160	Crowley County
Baca County	37.3055555	-102.5286110	797-800	284	Fremont County	128	Kiowa County		
Bent County	37.9666667	-103.0666667	053-056	263	Morgan County	127	Pueblo County	127	Pueblo County
Bent County	37.9666667	-103.0666667	129-132	127	Pueblo County	296	Rio Grande County	219	Arapahoe County
Bent County	37.9666667	-103.0666667	177-180	250	Denver County	127	Pueblo County		
Bent County	37.9666667	-103.0666667	217-220	240	Adams County	127	Pueblo County		
Bent County	37.9666667	-103.0666667	521-524	127	Pueblo County	219	Arapahoe County	278	Broomfield County
Bent County	37.9666667	-103.0666667	573-576	159	El Paso County	103	Cheyenne County	165	Huerfano County
Bent County	37.9666667	-103.0666667	617-620	127	Pueblo County	154	Kit Carson County	171	Elbert County
Bent County	37.9666667	-103.0666667	661-664	127	Pueblo County			231	Yuma County
Bent County	37.9666667	-103.0666667	701-704	127	Pueblo County			154	Kit Carson County
Bent County	37.9666667	-103.0666667	741-744	127	Pueblo County			266	Jefferson County
Bent County	37.9666667	-103.0666667	781-784	125	Lincoln County			219	Arapahoe County
Bent County	37.9666667	-103.0666667	829-832	159	El Paso County	154	Kit Carson County	103	Cheyenne County
Bent County	37.9666667	-103.0666667	869-872	154	Kit Carson County	127	Pueblo County	244	Alamosa County
Boulder County	40.0833333	-105.3500000	045-048	202	Logan County	96	Arapahoe County	58	Denver County
Boulder County	40.0833333	-105.3500000	089-092	156	El Paso County	110	Park County	96	Arapahoe County
Boulder County	40.0833333	-105.3500000	121-124	156	El Paso County			78	Summit County
Boulder County	40.0833333	-105.3500000	209-212	163	Chaffee County	96	Arapahoe County	90	Douglas County
Boulder County	40.0833333	-105.3500000	293-296	132	Morgan County	96	Arapahoe County	90	Douglas County
Boulder County	40.0833333	-105.3500000	345-348	178	Fremont County	90	Douglas County	58	Denver County
Boulder County	40.0833333	-105.3500000	413-416	163	Chaffee County	96	Arapahoe County	90	Douglas County
Boulder County	40.0833333	-105.3500000	489-492	208	Gunnison County	96	Arapahoe County	58	Denver County
Boulder County	40.0833333	-105.3500000	585-588	163	Chaffee County	96	Arapahoe County	58	Denver County
Boulder County	40.0833333	-105.3500000	625-628	136	Teller County	128	Eagle County	58	Denver County
Boulder County	40.0833333	-105.3500000	833-836	255	Delta County	86	Adams County	96	Arapahoe County
Boulder County	40.0833333	-105.3500000	901-904	163	Chaffee County			58	Denver County
Boulder County	40.0833333	-105.3500000	941-944	132	Morgan County			58	Denver County
Broomfield County	39.9333333	-105.0500000	169-172	162	Chaffee County	65	Arapahoe County		
Broomfield County	39.9333333	-105.0500000	465-468	145	Eagle County	31	Denver County	67	Douglas County
Broomfield County	39.9333333	-105.0500000	525-528	162	Chaffee County	200	Pueblo County	65	Arapahoe County
Broomfield County	39.9333333	-105.0500000	565-568	130	El Paso County	67	Douglas County	65	Arapahoe County
Broomfield County	39.9333333	-105.0500000	605-608	294	Las Animas County	67	Douglas County	65	Arapahoe County
Chaffee County	38.7666667	-106.1833333	169-172	145	Delta County	162	Pueblo County		



**Tab 5 ( Fox Ridge Communications, Inc. New Plan by County provided by City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Lat	Lon	FCC Channel Number	Closest Co-Chan (km)	County Name	Closest Lower (km)	County Name	Closest Upper (km)	County Name
Chaffee County	38.7666667	-106.1833333	209-212	163	Boulder County	162	Pueblo County	106	Eagle County
Chaffee County	38.7666667	-106.1833333	413-416	163	Boulder County	106	Eagle County	124	Douglas County
Chaffee County	38.7666667	-106.1833333	473-476	145	El Paso County	124	Douglas County	125	Jefferson County
Chaffee County	38.7666667	-106.1833333	525-528	154	Ouray County	138	Mineral County	105	Custer County
Chaffee County	38.7666667	-106.1833333	585-588	163	Boulder County	106	Eagle County	132	Rio Grande County
Chaffee County	38.7666667	-106.1833333	825-828	125	Jefferson County	145	El Paso County	145	El Paso County
Chaffee County	38.7666667	-106.1833333	901-904	163	Boulder County			146	Denver County
Chaffee County	38.7666667	-106.1833333	941-944	154	Ouray County			146	Denver County
Cheyenne County	38.8097222	-102.5763888	321-324	199	Las Animas County			180	Pueblo County
Cheyenne County	38.8097222	-102.5763888	473-476	167	Baca County	142	Otero County	131	Yuma County
Cheyenne County	38.8097222	-102.5763888	513-516	167	Baca County	139	Elbert County	182	Arapahoe County
Cheyenne County	38.8097222	-102.5763888	569-572	182	Arapahoe County	169	El Paso County	103	Bent County
Cheyenne County	38.8097222	-102.5763888	713-716	239	Huerfano County	95	Prowers County	131	Yuma County
Cheyenne County	38.8097222	-102.5763888	833-836	277	Boulder County	103	Bent County	131	Yuma County
Cheyenne County	38.8097222	-102.5763888	901-904	217	Logan County			95	Prowers County
Clear Creek County	41.6938888	-105.6350000	173-176	220	Morgan County	332	El Paso County	175	Routt County
Clear Creek County	41.6938888	-105.6350000	421-424	232	Denver County	175	Routt County	115	Larimer County
Clear Creek County	41.6938888	-105.6350000	461-464	232	Denver County	175	Routt County	202	Broomfield County
Clear Creek County	41.6938888	-105.6350000	521-524	402	Pueblo County	115	Larimer County	202	Broomfield County
Conejos County	37.1980555	-106.1711111	325-328	185	Pueblo County	146	La Plata County	126	Hinsdale County
Conejos County	37.1980555	-106.1711111	413-416	174	Chaffee County	274	Eagle County	185	Pueblo County
Conejos County	37.1980555	-106.1711111	457-460	180	Gunnison County	146	San Juan County	294	Denver County
Conejos County	37.1980555	-106.1711111	489-492	180	Gunnison County	124	Custer County	146	San Juan County
Conejos County	37.1980555	-106.1711111	573-576	232	El Paso County	229	Montrose County	124	Huerfano County
Conejos County	37.1980555	-106.1711111	613-616	235	Delta County	99	Saguache County	185	Pueblo County
Conejos County	37.1980555	-106.1711111	673-676	217	Dolores County	124	Huerfano County	158	Fremont County
Conejos County	37.1980555	-106.1711111	741-744	185	Pueblo County			282	Jefferson County
Conejos County	37.1980555	-106.1711111	793-796	217	Dolores County	194	Las Animas County	158	Fremont County
Costilla County	37.2961111	-105.4383333	209-212	176	Chaffee County	130	Pueblo County	130	Pueblo County
Costilla County	37.2961111	-105.4383333	353-356	176	Teller County	226	Ouray County	137	Mineral County
Costilla County	37.2961111	-105.4383333	393-396	189	El Paso County	205	Gunnison County	89	Custer County
Costilla County	37.2961111	-105.4383333	533-536	130	Pueblo County	89	Custer County	139	Archuleta County
Costilla County	37.2961111	-105.4383333	585-588	176	Chaffee County	139	Archuleta County	90	Rio Grande County
Costilla County	37.2961111	-105.4383333	825-828	176	Chaffee County	189	El Paso County	189	El Paso County
Crowley County	38.3500000	-103.7833333	357-360	153	Arapahoe County	133	Teller County	105	Las Animas County



**Tab 5 ( Fox Ridge Communications, Inc. New Plan by County provided by City of Aurora) to Appendix M (Minority Statement on Frequency Pre-Allotments) Region 7 - 700 MHz Regional Plan**

County	Lat	Lon	FCC Channel Number	Closest Co-Chan (km)	County Name	Closest Lower (km)	County Name	Closest Upper (km)	County Name
Crowley County	38.3500000	-103.7833333	457-460	153	Arapahoe County	128	Prowers County	178	Denver County
Crowley County	38.3500000	-103.7833333	493-496	149	Kit Carson County	235	Boulder County	105	Las Animas County
Crowley County	38.3500000	-103.7833333	541-544	149	Kit Carson County	128	Prowers County	83	El Paso County
Crowley County	38.3500000	-103.7833333	585-588	187	Costilla County	153	Arapahoe County	128	Prowers County
Crowley County	38.3500000	-103.7833333	673-676	192	Jefferson County	123	Huerfano County	105	Las Animas County
Custer County	38.0969444	-105.3372222	161-164	140	Las Animas County			75	Pueblo County
Custer County	38.0969444	-105.3372222	201-204	140	Las Animas County			75	Pueblo County
Custer County	38.0969444	-105.3372222	397-400	213	Adams County	89	Costilla County	140	Las Animas County
Custer County	38.0969444	-105.3372222	485-488	191	Arapahoe County	109	El Paso County	124	Conejos County
Custer County	38.0969444	-105.3372222	529-532	191	Arapahoe County	105	Chaffee County	75	Pueblo County
Delta County	38.8500000	-107.8500000	169-172	145	Chaffee County	78	Garfield County		
Delta County	38.8500000	-107.8500000	285-288	190	Rio Grande County	78	Garfield County	132	Eagle County
Delta County	38.8500000	-107.8500000	353-356	178	Montezuma County	78	Ouray County	78	Garfield County
Delta County	38.8500000	-107.8500000	405-408	123	San Juan County	198	Archuleta County	132	Eagle County
Delta County	38.8500000	-107.8500000	445-448	137	Lake County	120	Hinsdale County	78	Garfield County
Delta County	38.8500000	-107.8500000	509-512	137	Lake County	217	Fremont County	78	Garfield County
Delta County	38.8500000	-107.8500000	553-556	217	Fremont County	137	Lake County	120	Hinsdale County
Delta County	38.8500000	-107.8500000	613-616	179	Summit County	78	Garfield County	239	Jefferson County
Delta County	38.8500000	-107.8500000	717-720	155	Mineral County	78	Garfield County		
Delta County	38.8500000	-107.8500000	757-760	217	Fremont County	78	Garfield County		
Delta County	38.8500000	-107.8500000	833-836	123	San Juan County	78	Garfield County	197	Routt County
Denver County	39.6666667	-104.9500000	049-052	170	Pueblo County	58	Boulder County	91	Park County
Denver County	39.6666667	-104.9500000	057-060	113	Weld County	91	Park County		
Denver County	39.6666667	-104.9500000	097-100	137	Fremont County	49	Arapahoe County		
Denver County	39.6666667	-104.9500000	161-164	113	Weld County			49	Arapahoe County
Denver County	39.6666667	-104.9500000	177-180	198	Routt County	118	Morgan County		
Denver County	39.6666667	-104.9500000	201-204	113	Weld County			49	Arapahoe County
Denver County	39.6666667	-104.9500000	245-248	119	Larimer County	49	Arapahoe County	27	Jefferson County
Denver County	39.6666667	-104.9500000	281-284	153	Washington County			100	El Paso County
Denver County	39.6666667	-104.9500000	325-328	170	Pueblo County	27	Jefferson County	27	Jefferson County
Denver County	39.6666667	-104.9500000	349-352	146	Lincoln County	58	Boulder County	91	Teller County
Denver County	39.6666667	-104.9500000	405-408	113	Weld County	53	Gilpin County	49	Arapahoe County
Denver County	39.6666667	-104.9500000	421-424	195	Logan County	37	Douglas County	87	Elbert County
Denver County	39.6666667	-104.9500000	445-448	129	Lake County	53	Gilpin County	100	El Paso County
Denver County	39.6666667	-104.9500000	461-464	195	Logan County	49	Arapahoe County	31	Broomfield County